

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

ALLIANCE FOR AUTOMOTIVE INNOVATION,

Plaintiff,

v.

MAURA HEALEY, ATTORNEY GENERAL OF  
THE COMMONWEALTH OF  
MASSACHUSETTS, in her official capacity,

Defendant.

Civil Action No. 1:20-cv-12090

**ATTORNEY GENERAL'S EMERGENCY MOTION  
TO COMPEL PRODUCTION OF DOCUMENTS**

Pursuant to Federal Rule of Civil Procedure 37(a)(1), Attorney General Maura Healey,  
respectfully requests the following:

1. An order compelling the production to the Attorney General of all responsive documents that the plaintiff has proposed to make available only in Michigan and/or only on an “eyes only” basis;
2. An order compelling the production of documents that are claimed to be beyond the possession, custody, and control of Toyota and Mercedes-Benz;
3. An order compelling the production of responsive reports of security reviews that apparently have not been produced; and
4. An order extending the Attorney General’s deadline to serve expert disclosures to a date seven days after the plaintiff completes its production of these critical technical documents.

As grounds, the Attorney General incorporates the accompanying Memorandum of Law (ECF #102), Affidavit of Craig Smith with exhibit (ECF #103), Affidavit of Assistant Attorney

General Eric Haskell with exhibits (ECF #104), and Motion to Accept Filing Under Seal (ECF #105).\*

Respectfully submitted,

ATTORNEY GENERAL  
MAURA HEALEY

By her attorneys,

April 7, 2021

/s/ Eric A. Haskell  
Robert E. Toone, BBO No. 663249  
Eric A. Haskell, BBO No. 665533  
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**CERTIFICATES**

I certify that a true copy of this document will be sent electronically by the ECF system to attorneys of record identified on the Notice of Electronic Filing.

I further certify, pursuant to Fed. R. Civ. P. 37(a)(1) and LR 7.1(a)(2), that I have conferred with plaintiffs' counsel and attempted in good faith to resolve or narrow the issues presented by this motion without court action.

/s/ Eric A. Haskell

April 7, 2021

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Eric A. Haskell

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\* In accordance with the Confidentiality Protective Order entered in this case, the accompanying Memorandum of Law and Affidavit of Assistant Attorney General Eric Haskell have been electronically filed in redacted form. Unredacted paper copies will be submitted to the clerk's office tomorrow morning, April 8, when the lobby opens.